

**SUMMARY  
OF  
THE EVOLUTION OF THE AGENCY'S FES POSITION  
CLASSIFICATION STANDARDS PROGRAM POLICY**

1. The Job Evaluation Policy Act of 1970 (P.L. 91-216) expressed the intent of Congress that a common job evaluation and ranking methodology would be developed and established for the classification of certain positions within the Executive Branch of the Federal Government. Under provisions of the Act, the U.S. Civil Service Commission (CSC) was designated as the executive agency to develop and institute this common methodology with responsibility for general supervision and control of such a system. In 1976, the CSC completed the developmental aspects and instituted a uniform position evaluation system called the Factor Evaluation System (FES).

2. The FES concepts appeared sound, and the system itself more objective and understandable than other methods of position evaluation and ranking. As was long recognized by the Office of Personnel, and more recently noted by the Inspector General in the 1976 IG survey of the Office of Personnel, the lack of Agency approved position standards has been a major hindrance to full effectiveness of the Agency's position classification program. Accordingly, in July 1976, the Director of Personnel announced to senior agency managers the development, testing and implementation of a new position classification standards program following the factor evaluation methodology.

3. Preliminary testing within the Agency was subsequently conducted on several CSC FES position standards and initial efforts were undertaken to develop several in-house FES position standards using CSC FES principles and guidelines. It became apparent that many of the CSC FES standards were directly applicable to Agency occupations without significant changes. It was equally apparent that direct application of these standards in classifying Agency positions would reveal serious overgradings in many clerical occupations in addition to some overgrading, although to a lesser extent, in certain professional occupations. With the advent of the OMB grade de-escalation exercise, the pattern of higher grades for many Agency positions in relation to comparable positions in other Government agencies was graphically confirmed. However, in the absence of meaningful position standards, the degree of overgrading of Agency occupations, especially in the clerical field, could not be readily determined.

4. Because of the developing evidence of patterns of overgradings of agency positions in relation to the application of the newly developed position standards, PMCD, in early 1978, put forth certain policy alternatives to be considered in the implementation phase of the standards program process. These were:

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- (a) to apply directly the principles and practices of the Factor Evaluation System as instituted by the Civil Service Commission including the full utilization of Commission FES position standards where they were directly applicable to Agency occupations;
- (b) to modify the Civil Service Commission FES Standards to account for current Agency grade patterns which in many instances would be higher than permitted by the Commission standards;
- (c) to develop, internally, Agency position standards using other than FES methodology with such standards confirming current grade patterns for Agency occupations;
- (d) to abandon position standards development and retain current classification practices which consist of a potpourri of evaluative methods including job comparisons both internally and externally (government and private sector) of similar occupations and the application of some select Civil Service Commission standards.

5. The PMCD staff position on the above alternatives was that formalization of a position classification standards program was essential to the achievement of a sound and workable position classification program within the Agency. The development and use of standards provide for consistency in application and a greater degree of understanding on the part of managers and employees than is possible through classification practices which involve a variety of classification methodologies. Based on its initial review and testing of FES position standards, PMCD concluded that the most equitable, defendable and fairest method available is through the use of position classification standards patterned after those published by the CSC. As a result, recommendations were made to the Director of Personnel as follows:

- a. that the Agency continue its commitment to adhere to the principles of the Classification Act of 1949, as amended, and adopt for position classification purposes the Factor Evaluation System as developed and instituted by the Civil Service Commission for all Federal agencies subject to the Act;
- b. that FES position standards issued by the Commission be reviewed for applicability to Agency occupations and be directly applied where appropriate, or modified in those instances where clearly delineated differences are perceived;
- c. that position standards be developed internally for Agency-unique occupations, e.g., Operations Officer, following the principles of FES to maintain overall program consistency and equity;

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d. that all position standards, whether published by the Commission or developed internally within the Agency, be reviewed by the Office of Personnel and cognizant component managers and/or subject specialists for substantive content and, based on the results of such reviews, be revised accordingly;

e. that completed standards be approved by the Director of Personnel, on behalf of the DCI, for mandatory application within the Agency, such standards having the status and force of Agency regulations for classifying Agency positions.

6. On 28 February 1978, the Director of Personnel confirmed recommendations that the FES position standards issued by the CSC would be reviewed for applicability to Agency occupations and be directly applied where appropriate, or modified in those instances where clearly delineated differences are perceived. Position standards following the principles of FES are to be developed by PMCD for Agency-unique occupations. All position standards that are developed, whether published by the Commission, modified to adjust to differences in Agency occupations or developed for Agency-unique occupations, will be reviewed and approved by the Director of Personnel for application by PMCD within the Agency.

7. On 25 April 1978, the DDCI issued [redacted] titled Position Classification Appeals Procedures which outlined authorities to classify positions and recourses of appeals to classifications. The judicious exercise of this procedure is vitally important to the support and integrity of the Standards Program as well as the Position Classification program as a whole.